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March 19, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Service, Inc. for Provision of In-Region InterLATA Services in Michigan, WC Docket No. 03-16

Dear Ms. Dortch:

On Tuesday, March 18, 2003, Robert Quinn, Dina Mack, and the undersigned, all of AT&T, met with Jeff Carlisle, Scott Bergmann, John Stanley, Ben Childers, Denise Cocal, Russ Hanser, Marcus Maher, and Gina Spade of the Commission's Staff. The issues discussed included change management, line splitting, line loss notifications, billing, data integrity, and performance measurements. As follow up to that discussion, AT&T is providing the attached list of questions in response to the portion of SBC's March 14, 2003 ex parte that addresses line loss notifications.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Amy L. Alvarez".

cc: John Stanley
Gina Spade
Susan Pie

Questions in response to SBC's March 14th ex parte on LLNs

1. What is the data source for the data provided in column 2 (total CLEC LLNs Provided) in Table 1?
2. What is the data source for the data provided in column 3 (Inaccurate or Incomplete LLNs) in Table 1?
 - 2.a Does Table 1 col. 3 capture LLNs that should have been sent but were never sent? If so, how?
 - 2.b Describe how SBC gathered the data reflected in Table 1 col. 3.
 - 2.b.1 For example, did SBC examine each LLN during the relevant period to determine whether the LLN was inaccurate or incomplete?
 - 2.b.2 If not, please specify what data sources were reviewed in order to populate Table 1 col. 3.
 - 2.b.3 Does Col. 3 reflect all inaccurate/incomplete/untimely LLNs on which a CLEC reported a complaint?
 - 2.b.4 If so, how does SBC gather and keep such data? Finally, if it reflects more than one data source, has SBC attempted to reconcile those data sources?
3. What does timely mean in fn 6? Is that based on the existing PM MI 13 (i.e., the PM currently in effect)?
4. Is the difference between the denominators between Tables 1 and 2 due to the exclusion of manually distributed (i.e. fax) line loss notices and, if so, why are there so many manually distributed line loss notices?
5. Please provide the AT&T specific data for Table 1.
6. FN 6 says that these LLNs either were reported in PM MI 13 or would be reported in the new PM MI 13. What does that mean?
7. Please provide Michigan specific data for both Table 1 and Table 2. If SBC cannot provide Michigan specific data, please explain how SBC can accurately generate Michigan-specific performance reports for PM MI 13.
8. Please produce a Table 1 for the reports provided to retail.
9. What is the data source for the data provided in column 3 (total mechanized line losses) of Table 2?
10. The raw data for Table 2 is based on the new business rule for PM MI 13, but the data that AT&T reconciled with SBC was based on the existing business rule. Please restate Table 2 to follow the existing business rule with the addition of winbacks, and provide AT&T with the raw data underlying that recalculation.

11. When AT&T and SBC reconciled PM MI 13 for November and December, SBC stated that the 90% of the data not reflected in the measure was due to winbacks, and another 10% was due to problems SBC had with capturing certain CLEC-to-CLEC migrations. Please explain the reason that this 10% was not reflected in the measure, and explain how, if at all, that data was accounted for in Table 2.

12. When AT&T and SBC reconciled PM MI 13 for November and December, SBC provided raw data with an indicator that showed the identity of the winning CLEC. As AT&T pointed out in its reply comments, *see Moore/Connolly/Norris Reply Declaration ¶¶ 120-121*, some of these winning CLECs did not make any sense (e.g., Wallace (a carrier that was winning customers from AT&T before it entered the market) and AADS and Covad (carriers that don't have voice customers). AT&T requested an explanation from SBC on this point three weeks ago, and got no response. Please confirm whether or not such carriers were included in the raw data provided to AT&T in connection with SBC's March 14 ex parte ; if so, please explain the reason for the inclusion of these carriers in the raw data, explain whether the data in Table 2 were corrected in light of this error, and if not, please restate Table 2 accordingly.